

Barbara Bonds
Trust Counsel



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Received & Inspected

JAN - 7 2010

FCC Mail Room

January 6, 2010

VIA FEDERAL EXPRESS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

**Re: WC Docket No. 09-197
WWC License, LLC d/b/a Alltel's Eligible Telecommunications Carrier
Certification and 2009 Annual Report for the State of South Dakota (Pine
Ridge Reservation)—Supplemental Filing**

Dear Ms. Dortch:

WWC License, LLC d/b/a Alltel ("Alltel") through the Management Trust for Alltel Communications, LLC hereby submits the original and four copies of the following information:

- PUBLIC VERSION OF WWC LICENSE, LLC D/B/A ALLTEL'S ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND 2009 ANNUAL REPORT FOR THE STATE OF SOUTH DAKOTA (PINE RIDGE RESERVATION)—SUPPLEMENTAL FILING
 - Public Version of Revised Confidential Exhibit C
- (Separate Marked Envelope) CONFIDENTIAL VERSION OF WWC LICENSE, LLC D/B/A ALLTEL'S ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND 2009 ANNUAL REPORT FOR THE STATE OF SOUTH DAKOTA (PINE RIDGE RESERVATION)—SUPPLEMENTAL FILING
 - Confidential Version of Revised Confidential Exhibit C
- REQUEST FOR CONFIDENTIAL TREATMENT OF WWC LICENSE, LLC D/B/A ALLTEL

Alltel's Request for Confidential Treatment pursuant to 47 C.F.R. §§ 0.457(d) and 0.459 is made with respect to Revised Confidential Exhibit C. These confidential materials are enclosed in a separate, marked envelope.

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This filing is submitted for the study area codes listed below:

State	Spin	Study Area Code	Study Area Name
SD	143008900	399001	Alltel Communications, LLC

Please note that we have included the cover page for each filing for you to date-stamp and return to us in the enclosed envelope. If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Barbara Bonds'.

Barbara Bonds
Trust Counsel
Alltel Communications, LLC by Management Trust
(501) 905-1960

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
) WC Docket No. 09-197
Federal-State joint Board on)
Universal Service)

ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION
AND 2009 ANNUAL REPORT OF
WWC LICENSE, LLC D/B/A ALLTEL
FOR THE STATE OF SOUTH DAKOTA (PINE RIDGE RESERVATION)

SUPPLEMENTAL FILING

Background

47 C.F.R. § 54.209(a) requires a common carrier designated by the Commission as an ETC pursuant to Section 214(e)(6) of the Act to annually report certain information no later than October 1 of each calendar year. In satisfaction of the Commission's annual reporting requirement, on October 1, 2009, Alltel Communications, LLC ("Alltel") submitted its Annual Report, for the period January 1, 2008 through December 31, 2008. On December 1, 2009, Alltel received a request from the Wireline Competition Bureau ("WCB") seeking additional information relating to its Annual Report that was submitted on October 1, 2009. Alltel respectfully submits the attached supplemental filing in response to the WCB's December 1, 2009 request for additional information.

The information contained in the supplemental filing represents commercial and financial trade secrets regarding Alltel's network build-out plans and other matters that are highly sensitive due to the competitive nature of the commercial wireless industry. Accordingly, Alltel respectfully requests that the Commission treat this data as

confidential and withhold it from public inspection, pursuant to Sections 0.457(d)(1) and 0.459 of the rules.

Outage Reporting

47 C.F.R. § 54.209(a)(2) requires an ETC to annually report network outages within its ETC designated area. 47 C.F.R. § 54.209(a)(2) specifically requires:

Detailed information on any outage lasting at least 30 minutes that potentially affects at least ten percent of the end users served in a designated service area; or a 911 special facility (as defined in subsection (e) of Section 4.5 of the Outage Reporting Order). The annual report of the ETC must include: (i) the date and time of onset of the outage; (ii) a brief description of the outage and its resolution; (iii) the particular services affected; (iv) the geographic areas affected by the outage; (v) steps taken to prevent a similar situation in the future; and (vi) the number of customers affected.

Alltel submitted outage reports consistent with the above requirement as Confidential Exhibit C to its October 1, 2009 Annual Report. Confidential Exhibit C, did not identify any customers that were affected by any 911 outages because Alltel reported all 911 facility outages regardless of whether customers were affected by an outage. Alltel has built redundancies into its network to ensure the network can operate in emergency situations and therefore, customers' 911 service may not have been affected. The WCB's December 1, 2009 data request, however, asks Alltel to provide the number of customers that were potentially affected by the 911 outages

Alltel hereby submits the attached Revised Confidential Exhibit C. Revised Confidential Exhibit C identifies the number of customers that potentially could have been affected by the 911 facility outages experienced, during calendar year 2008, in the ETC designated area. The information on Revised Confidential Exhibit C reflects an estimate of the number of customers with a billing address in each affected wire center as of December 31, 2008.

Respectfully submitted,

WWC LICENSE, LLC D/B/A ALLTEL

By Barbara Bonds

Barbara Bonds
Alltel Communications, LLC by Management Trust

Confidential Exhibit Attached

PUBLIC VERSION – CONFIDENTIAL VERSION FILED UNDER SEPARATE COVER

REVISED CONFIDENTIAL EXHIBIT C

INFORMATION REDACTED

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY AS
THE FILER HAS REQUESTED CONFIDENTIAL TREATMENT**

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	WC Docket No. 09-197
Universal Service)	

**REQUEST FOR CONFIDENTIAL TREATMENT FOR REVISED CONFIDENTIAL
EXHIBIT C TO WWC LICENSE D/B/A ALLTEL'S ELIGIBLE
TELECOMMUNICATIONS CARRIER CERTIFICATION AND 2009 ANNUAL
REPORT FOR THE STATE OF SOUTH DAKOTA (PINE RIDGE RESERVATION)**

For the reasons stated herein, the Trustee of the Management Trust of Alltel Communications, LLC (the "Trustee") hereby requests that **Revised Confidential Exhibit C** (Progress Report on 2008 Service Improvement Plan for Study Area Code 399001) to WWC License, LLC d/b/a Alltel's ("Alltel") Eligible Telecommunications Carrier Certification and 2009 Annual Report for the State of South Dakota (Pine Ridge Reservation), be treated as confidential and not routinely made available for public inspection pursuant to 47 C.F.R. §§ 0.457(d) and 0.459. A redacted copy of **Revised Confidential Exhibit C** is being filed separately today for inclusion in the public record.

Revised Confidential Exhibit C contains information that qualifies as "commercial or financial information" that "would customarily be guarded from competitors," regardless of whether or not such materials are protected from disclosure by a privilege. *See* 47 C.F.R. § 0.457(d); *see also Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) ("[W]e conclude that financial or commercial information provided to the Government on a voluntary basis is 'confidential' for the purpose of Exemption 4 if it is the kind that would customarily not be released to the public by the person from whom it was obtained.")

The confidential information contained in **Revised Confidential Exhibit C** relates to anticipated Federal Universal Service Fund receipts and proposes infrastructure expenditures and capital improvements in Alltel's designated areas in South Dakota (Pine Ridge Reservation). The Commission has previously determined that information in a Service Improvement Plan is "Confidential" and has granted a Protective Order to allow access to protect against the dissemination of such "Confidential" information.¹ The Commission routinely grants Protective Orders to protect the confidentiality of such information.² Since the information in **Revised Confidential Exhibit C** is related to its Service Improvement Plan, it should be afforded "Confidential" status.

Revised Confidential Exhibit C contains sensitive information that if disclosed could place the Trustee and Alltel at a competitive disadvantage, including specific information regarding construction plans, that warrant protection under 47 C.F.R. § 0.459. The Trustee and Alltel would be placed at a significant disadvantage if this information is revealed to competing service providers, who stand to benefit competitively from any knowledge of the redacted commercial and financial information included in these materials. If the redacted commercial

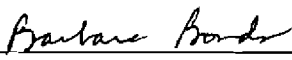
¹ See *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc. et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment*, WC Docket 05-337, CC Docket 96-45, Order, FCC 08-122 (rel. May 1, 2008); *In the Matter of Federal-State Joint Board on Universal Service, RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket 96-45, Order, DA 02-3181 (rel. Nov. 27, 2002).

² See *In the Matter of Federal-State Joint Board on Universal Service Petition of Cingular Wireless, LLC for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, CC Docket No. 96-45, Order, DA 07-3627, ¶¶ 1-3 (rel. Aug. 15, 2007); *In the Matter of Federal-State Joint Board on Universal Service NEP Cellcorp., Inc. Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania*, CC Docket No. 96-45, Order, DA 07-3628, ¶ 2 (rel. Aug. 15, 2007); *In the Matter of Federal-State Joint Board on Universal Service Petition of Centennial USVI Operations Corp. Petition for Designation as an Eligible Telecommunications Carrier in the United States Virgin Islands*, CC Docket No. 96-45, Order, DA 07-3979, ¶ 2 (rel. Sept. 20, 2007).

and financial information were disclosed to competitors of Alltel, they could use such information to compete against Alltel or take other action that would place Alltel at a substantial competitive disadvantage. The redacted material is not and has not previously been made available to the public, and the Trustee and Alltel have taken internal precautions to ensure that such information is not disclosed to the public.

Respectfully submitted,

January 6, 2010



Barbara Bonds
Trust Counsel
Alltel Communications, LLC by Management Trust
One Allied Drive
Little Rock, AR 72202